

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

AMRO FARID

vs.

23-cv-426-SM

TRUSTEES OF DARTMOUTH COLLEGE

DEPOSITION BY ZOOM OF ANDREW CAMPBELL, a witness called on behalf of the Plaintiff, pursuant to the Rules of Civil Procedure, before Karen D. Pomeroy, Registered Diplomate Reporter and Licensed Court Reporter (No. 71) in and for the State of New Hampshire, at [REDACTED], on Thursday, February 20th, 2025, commencing at 9:32 a.m.

1 APPEARANCES:

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6 For the Plaintiff

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13 For the Defendant

16 Also Present: Amro Farid

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STIPULATIONS

It is stipulated by and between counsel for the respective parties that the deposition transcript is to be read and signed by the deponent under the pains and penalties of perjury; and that the sealing and filing thereof are waived; and that all objections, except as to form, and motions to strike are reserved until the time of trial.

* * *

ANDREW CAMPBELL,

having been duly remotely sworn by the reporter, was deposed and testified as follows:

EXAMINATION

BY MR. SULMAN:

Q. Good morning, sir.

A. Good morning.

Q. Okay. Can you please state your name for the record.

A. Andrew Campbell.

Q. And would you like me to call you Dr. Campbell? Andrew? How would you like me to call you today?

1 decision making, and I certainly didn't have time
2 to do the opposite.

3 So that was the conflict really. I felt the
4 right thing was for the committee to actually
5 understand and process all of the information and
6 make a -- you know, a good, well-understood
7 judgment based on that.

8 For me that was the right way to go, but the
9 conflict was that would mean hundreds of hours.
10 I'd literally have to give up all the things I
11 was doing at the time, teaching, et cetera; so I
12 felt a struggle with that and the alternative,
13 which is to push it into the domain of experts
14 and so many reports going back to the committee.

15 Q. And is that what led to your resignation from the
16 committee?

17 A. Yes.

18 Q. So can you summarize for me why you resigned from
19 the committee?

20 MR. CHABOT: Asked and answered. Go ahead.

21 A. You want me to summarize all the things I just
22 said to you?

23 BY MR. SULMAN:

24 Q. Yeah. It was kind of over five minutes. Can you

1 just summarize why you resigned from the
2 committee.

3 MR. CHABOT: Same objection. Sorry.

4 A. I felt that --

5 BY MR. SULMAN:

6 Q. Go ahead.

7 A. I felt that it -- you know, I felt the committee
8 had -- in my opinion, had moved from the very
9 early period when it was operating, which in my
10 mind was, well, we had the paper; we had
11 interviewed Prabhat; we'd given Professor Farid
12 an opportunity to respond -- to meet the
13 committee.

14 At that point, with the information that we
15 had, before we had -- and I don't recall exactly
16 the date that we got the response from
17 Professor Farid, but in that early phase, to me,
18 the -- the workings of the committee were clear
19 cut and I had a clear-cut opinion about what had
20 happened here.

21 Then, post that additional information that
22 we had, I felt it moved into a completely
23 different domain where I struggled with the fact
24 that to do the right job, I would need hundreds

1 of hours of my time; and I couldn't do that, and
2 I didn't feel comfortable with it being in the
3 domain of experts telling me their opinion,
4 right.

5 So that was the conflict that was set up in
6 my mind and ultimately led me to decide that I
7 could no longer, you know, work on the committee.

8 Q. And when you -- and when you resigned from the
9 committee, had you made any determinations on the
10 allegations?

11 A. Well, I think, you know, it's -- that's a very
12 interesting question, and maybe I'll answer it
13 this way.

14 It really was like a moving target. That's
15 probably got the wrong analogy, but the amount of
16 information, particularly the last set of -- the
17 response from Professor Farid moved -- it -- you
18 know, it sort of moved the committee's work into
19 a -- sort of like -- you know, it sort of scaled
20 up what we needed to do because it -- to be fair
21 to Professor Farid, and of course that's what we
22 wanted to do, we'd have had to have gone through
23 each of his responses in -- I don't know how many
24 pages were in that document, over 200, and

1 actually convinced ourselves that he was right or
2 wrong, right, in his assessment of what happened,
3 and that was a massive undertaking, right, for
4 me.

5 So at that point, when I read his document,
6 without coming to any conclusions about what he
7 was writing about, I felt overwhelmed. That
8 was -- I felt overwhelmed.

9 But at the very early phases when we were
10 just looking at the early LaTeX or the early,
11 sorry, Overleaf from the student and what was,
12 you know, the initial ideas that were in the
13 paper that Prabhat provided to us, right, and
14 the -- and the published -- and the published
15 document, it was -- it was very clear to me --
16 and again this was early -- you know, I'm trying
17 to be very clear here.

18 So in the course of this whole, I don't know,
19 investigation I was involved in, in the early
20 phases before we got the response from -- from
21 Professor Farid, it seemed to me that the
22 allegations were correct in my mind; that what
23 had happened here was that the student had worked
24 on some ideas that were in the paper that ended

1 up in the final publication, and so early -- you
2 know, early on in -- whilst we never came to --
3 whilst we never wrote down any specific summary,
4 but in our discussions, I personally felt that
5 there was a strong case for research
6 misconduct.

7 Q. But that was before you received any response
8 from Professor Farid?

9 A. Yes, exactly. I want to make that clear. Things
10 changed, right, and I'd describe it as, you know,
11 the waters got muddied by the fact that we got
12 this and we had to, of course, take that into
13 account; so my opinions were set aside at that
14 point based on the early information that we got
15 in the committee; and with an open mind, I had to
16 say to myself, okay, well, now we have to
17 consider this, right; so -- but the early phases,
18 you know, because I myself am an advisor; I
19 myself have worked, you know, with students on
20 lots of papers, and the idea of like working with
21 a young Ph.D. student on a paper and for that
22 paper not to acknowledge him in any way seemed to
23 me to run counter to certainly everything that
24 I -- that I stand on as an academic.

1 So the early evidence strongly seemed to me
2 to be like it was a -- you know, in the sort of
3 like the Dartmouth plagiarism description, it was
4 sort of a significant departure from what I would
5 expect any academic to do in research.

6 Q. Thank you.

7 MR. SULMAN: Off the record.

8 (Recess was taken from 11:05 a.m. until 11:22 a.m.)

9 BY MR. SULMAN:

10 Q. Professor Cambell, I've sent you Exhibit 6
11 through the chat box. Let me know when you have
12 it open.

13 A. I don't see anything in chat. Okay. I see that.
14 Yeah.

15 Q. Okay. Exhibit 6 is an email from Prabhat Hegde
16 to yourself, Prasad Jayanti, and an email -- is
17 that Professor Loparo's email?

18 MR. CHABOT: Object to the form.

19 You can answer.

20 A. In this attachment, I only see an email.

21 Q. Right.

22 A. Okay.

23 Q. This is an email from Prabhat Hegde on
24 August 2nd; right?